

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

MOTORISTS MUTUAL INSURANCE
COMPANY, as subrogee of
Thomas Kalkhof and T.E. Kalkhof Realty Company

Plaintiff

v.

LINDA BEBKO-JONES

Defendant

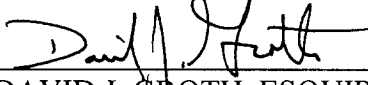
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: CIVIL ACTION NO: 05-140E
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MOTION FOR ADMISSION *PRO HAC VICE*

Now comes Plaintiff Motorists Mutual Insurance Company as subrogee of Thomas Kalkhof and T.E. Kalkhof Realty Company and hereby moves this Court for an order admitting Sean P. O'Donnell, Esquire of Cozen O'Connor, 1900 Market Street, Philadelphia, PA 19103, as counsel for Plaintiff *Pro Hac Vice*. Plaintiff respectfully represents that good cause exists for this motion as is more particularly set forth in the Affidavit in support of this motion, which is attached hereto and incorporated herein.

COZEN O'CONNOR

BY:



DAVID J. GROTH, ESQUIRE
PA State Bar ID No: 25567
1900 Market Street
Philadelphia, PA 19103
215-665-2000
Attorney for Plaintiff

Dated: August 3, 2005

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FOR THE WESTERN DISTRICT OF PENNSYLVANIA

MOTORISTS MUTUAL INSURANCE
COMPANY, as subrogee of
Thomas Kalkhof and T.E. Kalkhof Realty Company

Plaintiff

v.

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Defendant

CIVIL ACTION NO: 05-140E

AFFIDAVIT OF SEAN P. O'DONNELL

I, Sean P. O'Donnell, an attorney at law licensed to practice in the Commonwealth of Pennsylvania, being duly sworn, depose and say as follows:

1. I am a member of the law firm of Cozen O'Connor, 1900 Market Street, Philadelphia, Pennsylvania.

2. I am a resident of the Commonwealth of Pennsylvania and have been a practicing attorney for 10 years in the Commonwealth of Pennsylvania.

3. I am a member in good standing of the Bar of the Commonwealth of Pennsylvania and am duly licensed and admitted to practice law by the Commonwealth of Pennsylvania, having an Attorney Identification No. 76533.

4. I have also been admitted to the bars of the State of New Jersey, the United States District Courts for the Eastern and Middle Districts of Pennsylvania and the District of New Jersey.

5. I certify that no disciplinary or grievance proceedings have been filed or are currently pending against me in any Court.

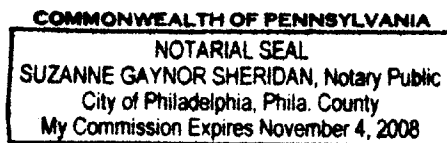
6. My client has requested that I represent its interests in this matter.

7. The nature of this action involves legal and factual issues in a field of law with which I am completely familiar since I have handled many of these types of cases in the past and have developed an expertise in these matters.

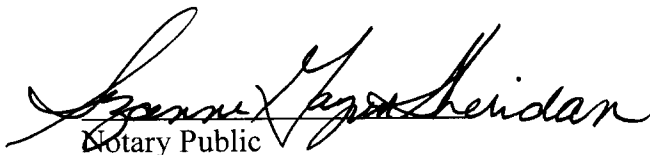
8. If the Court shall allow my Motion to Appear *Pro Hac Vice* in the above-captioned matter, with reference to all matters, incidents, or proceeding, I agree that I shall be subject to the orders and amenable to disciplinary action and the civil jurisdiction of this Court in all respects as if I were a regularly admitted.

9. I certify that all of the foregoing statements made by me are true and I am aware that if any of the foregoing statements are willfully false, I am subject to punishment.


SEAN P. O'DONNELL



Sworn to before me this day
of August 3, 2005.


Notary Public

CERTIFICATE OF SERVICE

I hereby certify that on the 3rd day of August, 2005, I served a true and correct copy of the foregoing Motion and Order for Admission *Pro Hac Vice* of Sean P. O'Donnell, Esquire, by First Class United States Mail, postage prepaid to the following:

Dale E. Huntley, Esquire
Walter E. Deacon, III, Esquire
MACDONALD, ILLIG, JONES & BRITTON, LLP
100 State Street
Suite 700
Erie, PA 16507-1459



DAVID J. GROTH, ESQUIRE

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May 10, 2005

Elizabeth Berglund
Paralegal
Direct Phone 215-665-4137
eberglund@cozen.com

Clerk of Courts
U.S. District Court
Western District of Pennsylvania
Erie Division
P.O. Box 1820
Erie, PA 16507

Re: Motorists Mutual Insurance Company, a/s/o Thomas Kalkhof and T.E. Kalkhof Realty
Company v. Linda Bebkö-Jones
U.S.D.C. W.D. of PA Civil Action No. 05-140E
Our File No. 157129

To Whom it May Concern:

Enclosed for filing please find Plaintiff's executed original and one copy of the Motion for Admission *Pro Hac Vice* of Sean P. O'Donnell, Esquire in the above-referenced matter. Kindly file the original and return a time-stamped copy to my attention via the enclosed self-addressed stamped envelope. Pursuant to your office's instructions, I am also including a copy of this filing on disc. Also enclosed is Cozen O'Connor check number 222188 in the amount of \$40.00 to cover the fee for this filing.

Please do not hesitate to contact me at 215-665-4137 should you have any questions regarding this matter. Thank you for your attention to the foregoing.

Sincerely,

COZEN O'CONNOR

A handwritten signature in cursive script, appearing to read "Elizabeth Berglund", is written over the printed name.

By: Elizabeth Berglund
Paralegal To:
SEAN P. O'DONNELL